

# Sika Sarnafil Inc.

*World Class Roofing and Waterproofing*

December 14, 2022

Carolyn Hoskinson, Director  
Office of Resource Conservation and Recovery  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave, NW  
Mail Code 5301P  
Washington, DC 20460

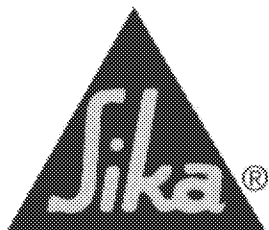
[Hoskinson.Carolyn@epa.gov](mailto:Hoskinson.Carolyn@epa.gov)

Re: Center for Biological Diversity Consent Decree and 2014 RCRA Petition

Dear Director Hoskinson,

First let me introduce myself and my company. My name is Sebastien Godard, I am the Executive VP of Sika's Roofing business here in the US. Sika is the world- wide leading producer of thermoplastic, single ply roofing membranes. We have successfully produced Sarnafil branded PVC Roof membranes for 60 years now. We also produce alternative roofing membranes using different chemistry or technology. As we have experience in making and installing a variety of roofing technologies, we believe we are more than qualified to state that PVC is a very sound roofing product with an excellent performance track record and presents no health hazard during and after construction and at the end of service life.

Our PVC Roof membranes have been used to protect some of the most well-known buildings in North America such as the new Los Angeles So-Fi Stadium, home to last year's Superbowl Champion LA Rams, The Dallas Cowboy Stadium, The Rogers Centre (former Skydome) in Toronto. The Roger's stadium is a great an example of what a PVC roof is capable of (see the attached project profile and short video-<https://usa.sika.com/sarnafil/en/sika-at-work/arenas-recreational-facilities.list.html/sika-at-work/arenas-recreational-facilities/rogers-centre.html>). Sarnafil membrane was selected to be installed on the Skydome, the first retractable roof in North America, in 1988. It was selected because of its light weight, exceptional fire resistance, energy savings due to its reflectivity, and aesthetics. After 30 years of watertight performance the roof was damaged from falling ice from a higher roof. Last year the 30-year-old membrane was removed and recycled into new roof membrane. PVC single ply roofing is the only commercial roof membrane that can be taken back and recycled at the end of its service life into new roof membrane. If you or anyone from your team is interested in learning more about what we do, please reach out.



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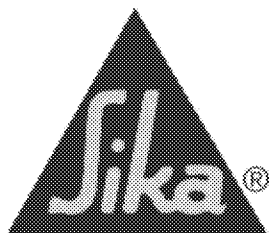
The petition submitted by the Center for Biological Diversity is flawed in that PVC is not a hazard at the end of its service life. If the EPA were to accept this premise it would do significant harm to our business and to many other companies.

It is interesting that PVC is unjustly under attack by this petition and at the same time Sika Sarnafil the company and our PVC product is being applauded by many for our environmental stewardship. See just a few examples listed below:

- Just last month, Sika was the first and only Commercial Roofing/Solar Manufacturer to have received Factory Mutual Approval for both fire and wind with its unique Sika SolaRoof solution.
- Sika is the first and only Roofing Company to publish cradle to grave EPD's because of our ability to recycle.
- Sika Sarnafil was the first commercial roofing company in the US to receive certification from UL Environment related to recycled content of its roofing membrane.
- Massachusetts Executive Office of Energy and Environmental Affairs presented Sika Sarnafil with a proclamation recognizing industry leading recycling program.
- Awarded the Environmental Merit Award from the US EPA, New England Region, for exceptional work and commitment to the Environment.
- Sika Sarnafil received Platinum Certification (highest possible) by National Science Foundation (NSF) International according to the standard created to evaluate single ply roofing.
- An Independent Study commissioned by the US DOE and EPA confirmed that Sika Sarnafil's EnergySmart Roof membrane reduces peak summertime air conditioning demand by 14%.
- Received the US DOE Rebuild America Energy Champion Award for promoting energy efficient technologies and practices for several years.
- Independent study by Carbotech of Basil, Switzerland, confirms Sarnafil membranes receives the highest eco-efficiency.
- Sika Sarnafil's green/vegetated roof on the Oaklyn Library won the Green Roof of the Year Award from Green Roofs for Healthy Cities.

In addition to Single Ply Roofing, there are many applications where PVC Products are used safely and provide building owners with durable and sustainable solutions:

- PVC pipe is widely used to deliver safe drinking water consistent with federal and state regulations with compliance verified under an independent, third-party certification program administered by NSF International.



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- Consistent with regulations and building codes, durable vinyl flooring, wall covering, carpet backing, windows, doors, decks, and fences are safe to live with and play on.
- In the Healthcare area, The Food and Drug Administration deems PVC medical devices, such as life-saving blood bags, to be safe.

We believe that the Petition submitted by the Center for Biological Diversity group is flawed in many ways but in part because it does not look at the product holistically including its usage, its service life, and the ability to be recycled. If it is looked at holistically in many applications PVC provides the best sustainable solution. Environmental Product Declarations can prove this out.

We believe that supporting this Petition will cause significant and unwarranted damage to our business, will create immediate unfair anti-trade challenges for all PVC products, and create unintended consequences such as a move away from time proven, long lasting PVC products to products without any vetting process with less of a performance record, resulting in more products being disposed of in landfills.

We find it ironic that the Center for Biological Diversity suddenly considers PVC to become a hazard at the end of its service life when PVC membrane liners have been used successfully as the containment liner and or cap at landfills to protect ground water and adjacent land. We also find it interesting that the Center of Biological Diversity has determined that somehow PVC magically is a hazard at the end of its service life. It is not hazardous at the end of its service life. We also find it interesting that the CBD thinks PVC is not fit for recycling or be managed as ordinary waste. Both are not true and are happening everyday today.

We request that the Petition be rejected by the EPA. Thank you for listening and if you have any questions, please let us know.

Regards,

*Sebastien Godard*

**Sebastien Godard**

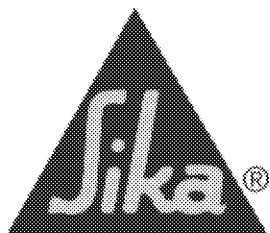
Executive Vice President - Target Market Roofing

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